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5 Attorneys for Plaintiffs

6 **DITECH FINANCIAL LLC and**

**FEDERAL NATIONAL MORTGAGE**

7 **ASSOCIATION**

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10  
11 DITECH FINANCIAL LLC; FEDERAL  
12 NATIONAL MORTGAGE ASSOCIATION, a  
government-sponsored entity,

13 Plaintiffs,

14 v.

15 RESOURCES GROUP, LLC, as Trustee of the  
16 REBER DR. TRUST,

17 Defendant.

CASE NO.: 2:17-cv-01823-JAD-CHW

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DITECH FINANCIAL LLC  
AND FEDERAL NATIONAL MORTGAGE  
ASSOCIATION TO RESPOND TO  
DEFENDANT'S RENEWED MOTION TO  
DISMISS**

**(FIRST REQUEST)**

18 Pursuant to LR 6-1(b), DITECH FINANCIAL LLC (formerly known as Green Tree  
19 Servicing LLC (hereinafter "Ditech"), FEDERAL NATIONAL MORTGAGE ASSOCIATION  
20 (hereinafter "Fannie Mae") and Resources Group, LLC as Trustee of the Reber Dr Trust (hereinafter  
21 referred to as "Defendant") by and through their attorneys, hereby stipulate and agree that Ditech  
22 and Fannie Mae shall be granted a thirty (30) day extension to file their Response to Defendant's  
23 Renewed Motion to Dismiss (ECF No. 28.) which is currently due on **December 13, 2018**. Good  
24 cause exists to extend the response deadline based on the volume of cases raising similar issues  
25 handled by counsel for Ditech and Fannie Mae. An extension for Ditech and Fannie Mae to respond  
26 to Defendant's Motion to Dismiss will allow Ditech and Fannie Mae the opportunity to more  
27 properly address the myriad of substantive issues raised in the Renewed Motion to Dismiss,  
28 including, *inter alia*, the Federal Foreclosure Bar and the constitutionality of NRS 116.3116, *et al*.

1 Therefore, the parties stipulate for an extension such that Ditech and Fannie Mae may file its  
2 Response to Defendant's Renewed Motion to Dismiss to **January 14, 2019**.

3 This stipulated extension is not submitted for any improper purpose or delay.

4 **IT IS SO STIPULATED.**

5 DATED: December 6, 2018

WOLFE & WYMAN LLP

7 By: /s/ Danielle A. Kolkoski

DANIELLE A. KOLKOSKI, ESQ.

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*Attorneys for Plaintiffs*

*DITECH FINANCIAL LLC and*

*FEDERAL NATIONAL MORTGAGE ASSOCIATION*

13 DATED: December 6, 2018

LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.

15 By: /s/Michael F. Bohn

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*Attorneys for Defendant RESOURCES GROUP, LLC*

*as Trustee of the Reber Dr. Trust*

22 **IT IS SO ORDERED.**

24 Dated: December 10, 2018.

26  
27   
28 UNITED STATES DISTRICT JUDGE